

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jean Green,

Court File No. _____

Plaintiff,

NOTICE FOR REMOVAL

v.

Wells Fargo Bank, N.A.,

Defendant.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA:

Petitioners\Defendants respectfully show and allege the following in
support of their Petition for Removal.

1. Petitioners are the Defendants in an action commenced against them in
Dakota County District Court entitled Jean Green v. Wells Fargo Bank, N.A.. A
true and correct copy of the Summons and Complaint served upon petitioners is
attached as Exhibit "A". No further proceedings have taken place in the state
action.

2. Plaintiff, Jean Green, is and was at all relevant times a citizen who
resides in Ely, County of St. Louis and in the State of Minnesota.
Petitioner\Defendant Wells Fargo Bank, N.A. is and at all relevant times a citizen
and a National Banking Association in the State of South Dakota with its principal
place of business in City of Sioux Falls in the State of South Dakota.

3. Complete diversity exists among the parties to this action and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332, and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

5. The Summons and Complaint in the state action was served on Defendant on or about December 21, 2018, and Petitioner\Defendant has filed this Notice to Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioner\Defendant prays that the state action pending against them be removed to this Court.

Dated: January 7, 2019.

Lind, Jensen, Sullivan & Peterson
A Professional Association

s\Brian A. Wood

By _____

Brian A. Wood #141690

Attorneys for Defendant
1300 AT&T Tower
901 Marquette Avenue South
Minneapolis, Minnesota 55402
(612) 746-0151
brian.wood@lindjensen.com